

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 19-70614-JAD
: :
Daniel M. Sollenberger : :
Betty A. Sollenberger : Chapter 13
: :
Debtors. : Document No. 55
: :
: :

STATUS REPORT

AND NOW comes Suzanne M. Bash, Esq., and hereby responds to the Text Order re: Amended Plan requesting the Plan be refiled on the current plan form, and in support thereof avers as follows:

1. An Amended Chapter 13 Plan was filed on October 30, 2023 with the Debtors' consent.
2. On October 31, 2023, a corrective entry was entered directing counsel to refile the Amended Chapter 13 using the current plan form. The corrective entry gave counsel until November 9, 2023 to refile the Amended Chapter 13 plan.
3. Prior to filing the Amended Chapter 13 Plan using the current plan form, the client contacted me revoking their consent to the Amended Plan. They realized that they would not have the necessary funds to pay the higher plan payment. They wanted to wait until early December to reevaluate the increase in the plan payment because the Wife would have a part time job to help pay the increase. Therefore, I did not file the Amended Plan as directed by the corrective entry.
4. I realize that I should have filed a status report to explain the circumstances of not being able to address the corrective entry in the time frame provided. Now that it is early December, I can file an Amended Plan using the current form, assuming debtors give me final and conclusive consent to do so.

Respectfully submitted,

December 4, 2023
DATE

/s/ Suzanne M. Bash, Esquire
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